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TAYLOR; AND THIRD-PARTY
DEFENDANT ROXANNE TAYLOR

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24 and ON CHAIN INNOVATIONS, LLC

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25
26 **UNITED STATES DISTRICT COURT**
27 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
28

1 HIDDEN EMPIRE HOLDINGS,
2 LLC; a Delaware limited liability
3 company; HYPER ENGINE, LLC; a
4 California limited liability company;
5 DEON TAYLOR, an individual,

6 Plaintiffs,

7 vs.

8 DARRICK ANGELONE, an
9 individual; AONE CREATIVE LLC,
10 formerly known as AONEE
11 ENTERTAINMENT LLC, a Florida
12 limited liability company; and ON
13 CHAIN INNOVATIONS LLC, a
14 Florida limited liability company,

15 Defendants.

CASE NO.: 2:22-cv-06515-MWF-AGR
(Hon. Michael W. Fitzgerald, Dept. 5A)

JOINT WITNESS LIST

Complaint Filed: September 12, 2022
Trial Date: January 13, 2026

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1 **TO THE HONORABLE COURT:**
23 Plaintiffs Hidden Empire Holdings, LLC, Hyper Engine LLC and Deon
4 Taylor and Third-Party Defendant Roxanne Taylor and Defendants Darrick
5 Angelone, AONE Creative LLC and On Chain Innovations LLC hereby submits
6 the following list of witnesses for trial in this matter.

<u>PARTY</u>	<u>WITNESSE</u>	<u>DIREC</u>	<u>CROSS</u>	<u>REDIRE</u>	<u>SUBJECT</u>
	<u>S</u>	<u>T</u>		<u>CT</u>	
Plaintiff	Darrick Angelone	6.0	4.0	1.0	All claims and defenses
Plaintiff	Roxanne Taylor	7.0	2.5	1.0	All claims and defenses
Plaintiff	Quincy Newell	4.0	1.0	1.0	Communications with Angelone and his attorneys
Plaintiff	Deon Taylor	5.0	2.5	1.0	All claims and defenses
Plaintiff	Velma Sykes	1.0	0.75	.5	Communications with Angelone
Plaintiff	Darrell Thompson	1.0	0.5	.5	Negotiations regarding status of restoring Google Workspace access
Plaintiff	Damien Douglas	2.0	1.0	.5	Communications with Darrick regarding Darrick's role
Plaintiff	Erin Burke	3.0	2.0	1.0	Expert Witness
Plaintiff	Alex Izen	1.0	0.5	.5	Expert Witness
Plaintiff	Sean Miller	1.0	0.5	.5	Communications with Darrick regarding Darrick's role
Defendant	Darrick Angelone	4.0	2.0	1.0	Mr. Angelone is expected to testify regarding his long-standing business relationship with Hidden Empire Film Group and its principals; the formation, purpose,



1 <u>PARTY</u>	2 <u>WITNESSE</u>	3 <u>DIREC</u>	4 <u>CROSS</u>	5 <u>REDIRE</u>	6 <u>SUBJECT</u>
7	8 <u>S</u>	9 <u>T</u>	10	11 <u>CT</u>	12
13	14	15	16	17	18 and operations of AOne Creative, LLC, On Chain Innovations, LLC, and Hyper Engine, LLC; the scope of services provided to Plaintiffs and affiliated entities; the parties' course of dealing; authorization to manage digital assets, domains, and email systems; billing, payment disputes, and termination of services; and Defendants' defenses and counterclaims. He may also testify regarding communications with Plaintiffs, third-party vendors, and consultants, and to rebut allegations of unauthorized access, data deletion, or misconduct.
19	20	21	22	23	24 Defendant Corporate Representative of AOne Creative, LLC / On Chain Innovations, LLC
25	26	27	28		29 The corporate representative of AOne Creative, LLC and/or On Chain Innovations, LLC is expected to testify regarding the entities' formation, ownership, and operations; the services provided to Plaintiffs and related entities; contracts, invoices, and payment history:

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7	8	9	10	11	12
					management of digital infrastructure including domains, email, and online platforms; and the circumstances surrounding the suspension or termination of services. The representative may also testify regarding damages, business records, and Defendants' defenses and counterclaims.
13 Defendant	14 Deon Taylor	15 3.0	16 2.0	17 0.75	18 19 20 21 22 23 24 25 26 27 28 Mr. Taylor is expected to testify regarding his role as a principal of Hidden Empire Film Group; negotiations and agreements with Defendants; the use of AOne, On Chain Innovations, and Hyper Engine in connection with film, marketing, and digital projects; authorization given to Defendants regarding access to accounts and systems; financial dealings and payment decisions; and the factual basis for Plaintiffs' claims, including allegations of lockout, data loss, and damages. His testimony may also be used for impeachment and rebuttal.

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	<u>S</u>	<u>T</u>		<u>CT</u>	
Defendant	Roxanne Avent Taylor	3.0	2.0	0.75	Ms. Taylor is expected to testify regarding her role in Hidden Empire Film Group's operations; agreements and communications with Defendants; provision of credentials and access to digital systems; internal bookkeeping, tax, and vendor practices; and her involvement in the formation, governance, and financial treatment of Hyper Engine, LLC. She may also testify regarding Plaintiffs' allegations of unauthorized access, data deletion, and damages, and Defendants' defenses thereto.
Defendant	Corporate Representative of Hidden Empire Holdings, LLC	1.5	1.0	0.5	The corporate representative of Hidden Empire Holdings, LLC is expected to testify regarding the entity's structure, ownership, and operations; its relationship with Defendants and Hyper Engine, LLC; payments made to or withheld from Defendants; use of Defendants for marketing, technology, and digital services;

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7	8	9	10	11	12
					and the factual basis for Plaintiffs' claims of harm or damages. The representative may also testify regarding business records and internal communications
9 Defendant	10 Corporate 11 Representativ 12 e of Hyper 13 Engine, LLC	14 1.5	15 1.0	16 0.5	17 The corporate 18 representative of 19 Hyper Engine, 20 LLC is expected to 21 testify regarding 22 the entity's 23 formation, 24 ownership, governance, and operations; its role in providing marketing, technology, and digital services; financial records and bank accounts; treatment of Hyper Engine as an operating business by Plaintiffs; and its involvement in specific projects at issue in the case. The representative may also testify to rebut Plaintiffs' assertions that Hyper Engine was not a legitimate or operating entity.
25 Defendant	26 Rick Watts	27 2.0	28 2.0	29 0.75	30 Mr. Watts is expected to provide expert testimony regarding technical and forensic issues, including Google Workspace administration, access logs, domain-registration records, and related

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					digital evidence. He may testify regarding whether the available data supports or contradicts allegations of unauthorized access, deletion of data, or system lockouts, and may rebut opinions offered by Plaintiffs' experts.
13 Defendant	14 John Ferry	15 0.75	16 0.75	17 0.25	18 Mr. Ferry is expected to testify regarding his work with Hidden Empire Film Group and his communications with Defendants concerning film-related projects, marketing initiatives, and the development of the Fear game. He may testify regarding day-to-day operations, use of email and digital systems, communications about access or credentials, and the parties' course of dealing during the relevant period.
19 Defendant	20 Michael Claps	21 0.75	22 0.75	23 0.25	24 Mr. Claps is expected to testify regarding his role as an assistant to Roxanne Avent Taylor and his involvement in Hidden Empire Film Group and Hyper Engine operations. He may testify regarding

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7	8	9	10	11	12 administrative 13 practices, access to 14 email and digital 15 systems, internal 16 communications, 17 and his 18 observations 19 concerning the 20 alleged lockout, 21 data access, and the 22 parties' disputes.
23 Defendant	24 Suzanne 25 Summerville	26 0.75	27 0.75	28 0.25	29 Ms. Summerville is 30 expected to testify 31 regarding her work 32 with Hidden 33 Empire Film Group 34 and Hyper Engine 35 on marketing and 36 media initiatives; 37 her 38 communications 39 with Defendants 40 and Plaintiffs; her 41 use of AOne- 42 managed email and 43 digital systems; 44 and documents she 45 maintained or 46 produced in the 47 ordinary course of 48 business, including 49 operating- 50 agreement drafts 51 and project 52 materials. Her 53 testimony may 54 address the parties' 55 course of dealing, 56 authorization, and 57 governance issues.
58	59 TOTAL 60 TIME:	61 49.75 hours	62 28.25 hours	63 13.00 hours	64

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1 Dated: January 5, 2026
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/s/ *Felton T. Newell*

5 Attorneys for Plaintiffs
6 **HIDDEN EMPIRE HOLDINGS, LLC;**
7 **HYPER ENGINE, LLC; AND DEON**
8 **TAYLOR; AND THIRD-PARTY**
9 **DEFENDANT ROXANNE TAYLOR**

Dated: January 5, 2026

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12 By: _____
13 J.T. Fox, Esq.
14 Attorney for Defendants and
15 **Counterclaimants, DARRICK**
16 **ANGELONE; AONE CREATIVE,**
17 **LLC, AND ON CHAIN**
18 **INNOVATIONS, LLC**